## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

IN RE: REGINALD GRANDISON	
/	CHAPTER 13 HON. Mark A. Randon CASE NO: 17-44173
REGINALD GRANDISON Plaintiff	
	Adversary No. 17-
V	
CREDIT UNION ONE  Defendant /	

## COMPLAINT TO STRIP OFF SECOND MORTGAGE LIEN OF CREDIT UNION ONE

- 1. Debtor filed his Chapter 13 petition on March 23, 2017.
- 2. At that time, her residence at 709 Chicago, Detroit MI was worth no more than \$155,000.
- 3. The balance on the first mortgage, held by Credit Union One, is \$155,317.00.
- 4. The City of Detroit has a lien for unpaid property taxes for \$1,177.00.
- 5. Therefore, there is no equity in the home to secure the second mortgage, also with Credit Union One, pursuant to 11 USC 506.

6.

WHEREFORE, Debtor-Plaintiff pray that this Honorable Court enter Judgment for him, against Credit Union ONe, stripping their lien on 709 Chicago, Detroit, MI, and disallowing any secured claim it might file, allowing it as an unsecured claim.

Date: April 19, 2017

/S/ Kurt OKeefe

Kurt O'Keefe P30718 Attorney for Debtor-Plaintiff 1593 Torrey Road G. P. Woods MI 48236 313.962.4630 koklaw@gmail.com